Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

September 7, 1999

Mr. Wayne Pierre, Team Leader
Environmental Cleanup Office
U.S. Environmental Protection Agency
Region X
1200 Sixth Avenue
Seattle, Washington 98101

Mr. Dean Nygard, Bureau Chief
Idaho Department of Health & Welfare
Division of Environmental Quality
Community Programs
1410 N. Hilton
Boise, Idaho 83706

SUBJECT: Transmittal of the Draft Final OU 1-10 Record of Decision for Test Area North Operable Unit 1-10 Comprehensive Remedial Investigation/Feasibility Study at the Idaho National Engineering and Environmental Laboratory (OPE-ER-125-99)

Dear Mr. Pierre and Mr. Nygard:

Enclosed for your review is the Draft Final OU 1-10 Record of Decision (ROD) for Test Area North (TAN) Operable Unit (OU) 1-10. This document incorporates resolutions to agency review comments. The selected alternative for the V-tank site has changed since the draft ROD was issued. The selected alternative is now Alternative 2, Soil and Tank Removal, Ex Situ Treatment of Tank Contents, and Disposal. The reasons for this change are discussed in detail in Section 11.2 of the Draft Final ROD. If you have any questions regarding the Draft Final ROD please contact Mark Shaw at (208) 526-6442.

Sincerely,

Kathleen E. Hain

Kathleen E. Hain, Manager
Environmental Restoration Program

Enclosures

cc: C. Cody, DEQ, 1410 N. Hilton, Boise, ID 83706
M. Wilkening, EPA Region X, 1200 Sixth Ave., Seattle, Washington 98101

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DOCUMENT TITLE/DESCRIPTION: Draft WAG 1 ROD

DATE: August 12, 1999 **REVIEWER:** IDHW

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			GENERAL COMMENTS	
1	General Comments		One of the initial attractions of Alternative 4 (ISV) for remediation of the V-tanks was the potential comprehensive removal or destruction of a wide range of contaminants (VOCs, PCBs, mercury), and the long-term entrainment of radionuclides in the glass-like melt. But, just as important was the fact that at the time Alternative 4 was developed and proposed, other reasonable options, especially those entailing removal and off-site disposal, were not available for these waste types. Facilities either did not exist or were not permitted to dispose of mixed wastes similar to those found in the V-tanks. Presently, it appears that one or more facilities may now have the technical ability, and just as importantly, be permitted, to treat the V-tanks wastes. An example that has been cited is ATG, Inc, based in Richland, Washington. The DOE believes this option is now available, and is very similar to Alternative 2 for the V-tanks, *Soil and Tank Removal, Ex Situ Treatment of Tank Contents, and Disposal.* The technical details, and costs, for Alternative 2 can be found in the RI/FS but they need to be revised and updated. If it is now believed that Alternative 2 is implementable and cost effective in comparison to ISV, then the DOE needs to develop the alternative in more detail (update the information in the RI/FS) befitting the "preferred" alternative, including cost tables. The description of the alternative should include a complete description of the remedy to address all primary and secondary source areas, treatment and storage of waste and contaminated media and an analysis of ARARs necessary to implement the entire remedy. A revised cost estimate is also necessary. This information needs to be completed and sent to the DEQ and EPA prior to the agencies review of the draft final TAN ROD in order for the document to reflect this change.	Comment Noted: Per 8/04/99 conference call, IDHW agreed that the project team is proceeding per this comment.

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2			Another aspect of the V-tanks remediation that needs to be considered is the regulatory closure of the tank system to comply with HWMA closure requirements. The system includes all facilities that were associated with the V-tanks operations, including but not limited to the entire network of associated piping, the PM-2A tanks, and the associated facilities in Building 616. HWMA closure requirements are applicable to these units. The definition of the V-tank system needs to be clearly stated in the ROD, and agreement reached between DEQ and DOE concerning how to comply with HWMA closure requirements.	Comment noted. The ROD in several sections state that the PM-2A and V-Tanks selected remedy will satisfy the substantive and administrative RCRA closure requirements. However, if a RCRA closure of the system is necessary, it will be addressed by a separate action.
3			The selected remedy for the V-tanks is presently in-situ vitrification (ISV). The ISV process can produce air emissions. However, comments on the control, release, and impact of the ISV air emissions will be reserved until a more detailed account, such as a workplan, is available for review. The comments will primarily be directed to the control, monitoring, and sampling of air emissions of radionuclides, metals, and organic compounds.	Comment noted: The selected remedy for the V-tank has been changed to Alt 2, and any air emissions monitoring, etc. will be included in the RD/RA Work Plan.
4			Please be aware that many portions of the Responsiveness Summary (RS) may require revisions, based on potential changes to the draft ROD text. An example is numerous discussions in the RS that assume ISV is the selected remedy. Recent Agencies/DOE discussions, and comments (See General Comment #1) contained in this document, indicate there may be changes in the next draft.	Comment noted.
SPECIFIC COMMENTS				
Part I – Declaration				
1	bullet list	Page iv,	The order of the second and third bullets should be reversed. The installation of the ISV equipment will occur or take place before the installation of the hood and off-gas system.	Comment noted. The selected remedy for the V-Tanks has been changed to Alternative 2.
2	first bullet beneath TSF-	Page v,	The concept of "final remediation goal" (and "remediation goals" in the previous PM-2A Tanks discussion) should be	Not incorporated. The concept of the remediation goals is discussed in Section 6.4.1.

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	06, Area B		explained earlier in the test, such as in the "Assessment of the Site" section. The remediation goals are what drive the clean-up.	
3	first paragraph of the Burn Pits discussion	Page vi,	The next to last sentence of this paragraph appears redundant. The concept was stated in the previous portion of the paragraph.	Comment incorporated.
4	last paragraph	Page vi,	It should be added that if the excavation and disposal option is implemented, and all contaminants are removed, than an additional benefit is that implementation of institutional controls would not be required.	Comment incorporated.
5	first bullet of Fuel Leak (WRRTF)-13)	Page vii,	The first bullet cites the *Risk-Based Corrective Action Guidance Document for Petroleum Releases* as guidance in the land farming of petroleum contaminated soils. In addition to this document, the Idaho Division of Environmental Quality (IDEQ) also published a series of related documents. *Information Series #7: Procedures for Land Treatment of Petroleum Contaminated Soils* may include additional requirements. This document should be referred to also for guidance.	Comment incorporated.
6.	bulleted selection remedy components at top of page	Page vii,	The order of the bullets would make more sense if the fourth bullet was inserted immediately after the second	Comment noted.
7	discussion under "Potential New Sites"	Page vii,	"Comprehensive" should be deleted from the first sentence. The first sentence is essentially saying that there is a possibility that the investigation may not be comprehensive.	Not incorporated. Operable Unit 1-10 is designated in the FFA/CO as the "WAG 1 Comprehensive RI/FS." The OU 1-10 investigation is comprehensive of all WAG 1 sites currently identified in the FFA/CO.
8.	partial paragraph at top of page	Page viii,	Please explain what "engineering controls" are.	Comment Noted: "such as containment" was added after engineering controls.

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Part II – Decision Summary				
9	section 1.1, last paragraph	Page Part II 1-3	It is not understood what is meant by an *"unsecured* DOE facility or non-DOE industrial/research facility". Several sites may involve leaving contaminants in place with institutional controls in place to prevent access or subsurface intrusion. Please explain how this constitutes "unsecured".	Comment noted. This sentence was deleted since under CERCLA it has been agreed DOE provide security to the INEEL for 100 years.
10	end of Sections 2.2 (third paragraph and AR locations) and 2.3	Page Part II 2-2,	These two sections would be more appropriately located in the following Community Participation Section. The most recent draft ROD guidance Community Participation as the appropriate section to discuss the AR location and reference materials pertinent to the AR.	Comment incorporated.
11	second full paragraph	Page Part	Between the three Proposed Plan public meetings held February 23 - February 26, 1998, there were more than 20 members of the public that attended these meetings.	Comment noted. The sentence was changed to "More than 20 members of the public, not associated with the project,..."
12	Page Part II 4-1,	section 4.0, bottom paragraph	Please delete "If remedial action is required at this site". The treatability study is designed to determine uptake factors and there has been no discussion to date, nor concurrence, on remedial action with WAG-10.	Comment incorporated. The paragraph was revised to state that WAG 10 would conduct treatability studies and WAG 1 would remediate, if necessary.
13	section 6.3, bottom paragraph	Page Part II 6-5,	The remedial alternative selected in the OU 1-07B ROD is meant to restore the aquifer to beneficial use, and beneficial use is the MCL. Trichloroethylene concentrations in the plume should be restored to 5 µg/L, not 25 µg/L as suggested here. The 25 µg/L concentration is an arbitrary concentration chosen as a boundary for extraction and treatment of the dissolved phase portions of the plume having TCE concentrations greater than 25 µg/L.	Comment incorporated. Changed 25 µg/L to 5 µg/L.
14	Table 6-1	Page Part II 6-7,	Lead as a COC needs to be qualified with an asterisk, similar to Cesium-137. The planned sampling at both burn pits may reveal additional COCs.	Comment incorporated. Table 6-1 has been revised to include additional information.

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15	Page Part II 7-1,	section 7.1.1, last paragraph	Table 7.1 does not show the results of the ERA as stated in the first two sentences of this paragraph. Please change the narrative, or add the ERA data to Table 7.1.	Comment noted. No sentence was revised. As discussed in Section 7.1.1.2, the V-tank sites do not pose an unacceptable risk to ecological receptors.
16	Section 7.1.4.3, last paragraph	Page Part II 7-6,	The stable glass waste form produced by ISV is very low permeability but cannot be demonstrated to actually be "non-leachable". There may be deterioration of the glass body with time. Please delete non-leachable from the sentence.	Comment noted: The selected alternative for the V-Tank has been changed from Alt 4 to Alt 2.
17	Section 7.1.2.3, first paragraph	Page Part II 7-4,	The fate of mercury should merit a separate discussion in this paragraph.	Comment Noted: The selected alternative for the V-Tank has been changed from Alt 4 to Alt 2.
18	Section 7.1.3	Page Part II 7-4,	The discussion of the three categories for the nine CERCLA evaluation criteria should have been initially included back on page Part II 6-8 in Section 6.4.2.1.	Comment incorporated: Revised Section 6.4.2.1 to include same text.
19	Section 7.1.4.3 and Table 7-3, page Part II 7-11	Page Part II 7-6,	Based on previous statements made by DOE and LMITCO, a formal treatment variance application through IDAPA 16.01.05.011 (40 CFR 268.42 (b)) - Alternative Treatment Technology for ISV treatment was expected. The ARAR is cited in the ARARs Table (Table 7-3). However, there was little discussion in the text other than on Page 7-6. The last sentence on Page 7-6 states "Therefore, EPA has approved the use of ISV as an alternative to the technology-based-standard of vitrification for the V-tank waste." The IDHW is not aware of any approvals for this treatment variance. Please explain the statement about obtaining EPA approval for this variance. The selected remedy for the V-Tanks is in situ vitrification (ISV) of the tank contents and adjacent contaminated soils within the treatment area. Table 7-3 lists the ARARs which are proposed as applicable or relevant and appropriate for the ISV remediation of the V-Tanks. The ARARs from Table 7-3 include the following HWMA/RCRA provisions: The selected remedy for the V-Tanks is in situ vitrification	Based on discussions with EPA and the State, it was understood that RCRA LDR criteria would be relevant and appropriate, and that preparation of a treatment variance application would be unnecessary since it is an administrative requirement only. Approval from EPA would have been obtained through ROD signature. The selected remedy has been changed to ex-situ thermal treatment. A draft set of ARARs has been submitted to the agencies for comment.

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			(ISV) of the tank contents and adjacent contaminated soils within the treatment area. Table 7-3 lists the ARARs which are proposed as applicable or relevant and appropriate for the ISV remediation of the V-Tanks. The ARARs from Table 7-3 include the following HWMA/RCRA provisions: IDAPA 16.01.11.200 - Idaho Groundwater Quality Rule Primary Drinking Water Standards IDAPA 16.01.05.006 (40 CFR 262.11) - Hazardous Waste Determination IDAPA 16.01.05.006 (40 CFR 262 Subpart B) - The Manifest IDAPA 16.01.05.006 (40 CFR 262.30 - 33) Pre-Transportation Requirements IDAPA 16.01.05.008 (40 CFR 264.13 (a) (1-3) General Waste Analysis IDAPA 16.01.05.008 (40 CFR 264.14) Security of the Site IDAPA 16.01.05.008 (40 CFR 264.15) General Inspections IDAPA 16.01.05.008 (40 CFR 264.16) Personnel Training IDAPA 16.01.05.008 (40 CFR 264.09 (f) and 264.110(c)Groundwater monitoring and post closure care IDAPA 16.01.05.008 (40 CFR 264 Subpart C) - Preparedness and Prevention IDAPA 16.01.05.008 (40 CFR 264 Subpart D) - Contingency Plan and Emergency Procedures IDAPA 16.01.05.008 (40 CFR 264.114) - Equipment Decontamination IDAPA 16.01.05.008 (40 CFR 264.171 - 177) - Use and Management of Containers IDAPA 16.01.05.008 (40 CFR 264.310 (a) 1, 2, 3, 4, 5, and (b) 1, 5, and 6 –Closure and Post Closure Care	

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			IDAPA 16.01.05.008 (40 CFR 264.554) – Staging Piles IDAPA 16.01.05.008 (40 CFR 264 Subpart X) -Miscellaneous Units(ISV system) IDAPA 16.01.05.011 (40 CFR 268.40 (a) (b) and (e) Land Disposal Restrictions Treatment Standards IDAPA 16.01.05.011 (40 CFR 268.45 (a) (b) © and (d) – Treatment Standards for Hazardous Debris IDAPA 16.01.05.011 (40 CFR 268.48 (a)) - Universal Treatment Standards IDAPA 16.01.05.011 (40 CFR 268.49) - Alternative Treatment Standards for Contaminated Soil IDAPA 16.01.05.011 (40 CFR 268.42 (b)) – Alternative Treatment Technology for ISV treatment	Accept. The IDAPA citings will be provided.
			There is agreement with the HWMA/RCRA ARARs that are listed in Table 7-3, with the following exceptions; the format of the citations should be modified to be complete and consistent. The IDAPA citings are listed for each of the 40 CFR citations. Table 7-3 lists IDAPA citations only for the first 40 CFR citations. The IDAPA citations should be listed first followed by the 40 CFR citation in parentheses	
			IDAPA 16.01.05.008 (40 CFR 264.09 (f) and 264.110 © Groundwater monitoring and post closure care are listed as relevant and appropriate for this project. There is no 40 CFR 264.09 (f) and 264.110 © in the regulations. DOE should provide the correct citations.	40 CFR 264.09 (f) is a typographical error; it should be 40 CFR 264.90(f). 40 CFR 264.90(f) and 40 CFR 264.110 (c) are federal regulations promulgated on October 22, 1998 (63 FR 56 F10) to amend requirements on land disposal units requiring post closure care.
			Also, the table cites IDAPA 16.01.01.210, "Demonstration of Preconstruction Compliance with Toxic Standards" as a Chemical-Specific ARAR. Due to the application of this citation to construction permits, this has been deemed an administrative requirement in previous INEEL FFA/CO projects.	This ARAR will be deleted. Thank you for the Clarification.

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			In addition, the following ARARs should be considered as applicable or relevant and appropriate: IDAPA 16.01.05.008 (40 CFR 264.97) General groundwater monitoring requirements IDAPA 16.01.05.008 (40 CFR 264.110 - .111) – Closure and Post Closure	For the ISV alternative, the new federal regulations cited above for closure and post-closure care of land disposal units would have provided flexibility to use alternative mechanisms to address the groundwater monitoring and closure/post-closure requirements.
20	Section 7.2.2	Page Part II 7-13	Although there may be a question of consistency with the FS, alternative 2 is more accurately described as "Excavation, Tank Removal, Ex Situ Stabilization, and Disposal.	Comment noted. The reviewer is correct but to maintain consistency with FS and Proposed Plan text will remain the same.
21	Section 7.2.2.2, last paragraph of page	Page Part II 7-13	This section discusses the different types of vacuum-assisted soil excavation, and the selected remedy (Alternative 3d) will not utilize the addition of water. The vacuum system will produce emissions of organic compounds in addition to radionuclides, particulates, and metals. Please state what type of air pollution control system will be utilized along with this vacuum system.	Comment noted. This information and detail will be provided in the RD/RA Work Plan. However, VOCs are not expected since sample results for VOCs were non-detect, HEPA filters will be used for Rad and particulates and metals.
22	Section 7.2.2.2, second paragraph on page	Page Part II 7-14,	The selected remedy for the PM-2A tanks is soils excavation, tank content removal, treatment and disposal. Contaminated soils are to be disposed at an on-site soil repository. The tank contents will be sampled, characterized, treated and disposed at an on-site repository or off-site RCRA compliant facility. Page 7-14, second paragraph, last sentence states "Because use of the industrial vacuum would result in a waste form not requiring additional treatment, Alternative 3d would result in a substantially lower cost". The vacuum technology will be used to remove the contents from the tank. Please explain how the use of the vacuum will result in a waste not requiring additional treatment. Treatment of hazardous constituents will be dependent on presence and concentration of hazardous wastes within the waste form as well as radiological contaminants present. The first paragraph on page 7-14 states that sampling will be performed to determine if the contents will require	Waste in the PM-2A tanks was removed in the early 1980's; only a small volume that could not be removed with available technology was left in the tanks. D&D added a very large quantity of diatomaceous earth to absorb the remaining liquids after emptying out the tanks. Consequently only a small fraction of the total volume of material in the tank is contaminated; most of the diatomaceous earth has not contacted the waste. The non-contaminated diatomaceous earth will be blended with the contaminated diatomaceous earth during remediation, thus eliminating the high variability in constituent concentrations. Based on available data and the known amount of diatomaceous material added by D&D, it is estimated the waste will meet disposal criteria without further treatment.

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			additional treatment. These statements are inconsistent.	
23	Table 7-6	Page Part II 7-19	Table 7-6 lists the HWMA/RCRA ARARs that are applicable or relevant and appropriate for this action. Table 7-6 includes the following HWMA/RCRA regulations: IDAPA 16.01.05.006 (40 CFR 262.11) - Hazardous Waste Determination IDAPA 16.01.05.006 (40 CFR 262 Subpart B) - The Manifest IDAPA 16.01.05.006 (40 CFR 262.30 - 33) - Pre-Transportation Requirements IDAPA 16.01.05.008 (40 CFR 264.13 (a) (1-3) - General Waste Analysis IDAPA 16.01.05.008 (40 CFR 264.14) Security of the Site IDAPA 16.01.05.008 (40 CFR 264.15) General Inspections IDAPA 16.01.05.008 (40 CFR 264.16) Personnel Training IDAPA 16.01.05.008 (40 CFR 264 Subpart C) – Preparedness and Prevention IDAPA 16.01.05.008 (40 CFR 264 Subpart D) – Contingency Plan and Emergency Procedures IDAPA 16.01.05.008 (40 CFR 264.114) - Equipment Decontamination IDAPA 16.01.05.008 (40 CFR 264.171 - 177) - Use and Management of Containers IDAPA 16.01.05.008 (40 CFR 264.197 (a) except for the last sentence - Tank Closure and Post Closure Care. IDAPA 16.01.05.008 (40 CFR 264 Subpart X except 264.603) - Miscellaneous Units The following ARARs should be included in Table 7-6: IDAPA 16.01.05.011 (40 CFR 268.40 (a) (b) and (e) Land	Accept – the RCRA LDRs are listed under chemical specific ARARs, page f-19

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			Disposal Restrictions Treatment Standards IDAPA 16.01.05.011 (40 CFR 268.48 (a)) - Universal Treatment Standards IDAPA 16.01.05.011 (40 CFR 268.49) - Alternative Treatment Standards for Contaminated Soil CERCLA offsite policy LDRs are applicable in this case since waste in the tanks contains F001 waste and characteristic metals. The format of the citations should be modified to be complete and consistent. IDAPA citings for each of these 40 CFR citations are listed in these comments. Table 7-6 lists IDAPA citations only for the first 40 CFR citation. The IDAPA citations should be listed first followed by the 40 CFR citation in parentheses.	These citations will replace the RCRA – 40 CFR 268 sub part D Accept Please note – TCLP analysis not performed on waste samples. Based on the totals analysis, the waste is not expected to exhibit the characteristics for metals
24	Table 8-3	Page Part II 8-7,	The selected remedy for the soil contamination area south of the turntable is excavation and on site disposal at an INEEL soil repository. The only contaminant of concern listed is Cesium-137. Only one HWMA/RCRA ARAR is listed in Table 8-3 - ARARs for the Soil Contamination Area South of the Turntable; *IDAPA 16.01.05.006 (40 CFR 262.11) - Hazardous Waste Determination.* The hazardous waste determination must include all HWMA/RCRA contaminants known or thought to be present in the PM-2A tanks including characteristic hazardous metals. If hazardous wastes are present based on the hazardous waste determination, then additional ARARs would be applicable or relevant and appropriate, similar to the ARARs listed for the PM-2A tank remediation ARARs. The ROD should discuss contingencies since it is unknown if hazardous wastes are present in the windblown contaminants.	Per the 8/25/99 WAG 1 Project Team conference call, it was agreed that pre-excavation samples will be collected for a no-longer-contained-in determination, see Section 8.1.4. Text will be added to this section which will state that this site will not be considered listed waste. However, during pre-excavation sampling, samples will be collected for RCRA characteristics.

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25	Section 8-2 and Table 8-	Page Part II 8-9,	The selected remedy for the disposal pond is limited action including inspections of operational and institutional controls, implementing additional institutional controls, and performing environmental monitoring. The text in Section 8.2, page Part II 8-9, states that the only COC at the disposal pond is cesium-137. However, Table 8-4 indicates that the residential scenario hazard index is principally a result of mercury with a hazard index of 1. Please explain why mercury is not listed as a COC.	Mercury is a non-carcinogen, with a calculated value of 0.9 in the baseline risk assessment. The presence of other metals yielded a total of 0.1. The summation of mercury plus other metals yielded the reported value of 3 for the Total Hazardous Index. The remedial action objective as stated in the RI/FS, page 9-4 is to remediate any COC with a hazardous quotient >1.0.
26	Section 8.2.2.2 and Section 8.2.2.3 discussions	Page Part II 8-10	In the Alternative discussions in each section the advantages of a cover, one (Alternative 1) to eliminate water from the pond and prevent exposure, the other (Alternative 2) to eliminate the same but also *inhibit plant from growing and animals from burrowing,* are discussed. It seems this should be a consideration for Alternative 1 also, as a burrowing organism will encounter radionuclides during the institutional control period, if there is no biobarrier in place. Please explain why this should not be a consideration for the selected remedy (Alt. 1) during the period of vulnerability.	Comment incorporated. Section 8.2.2.1 (sections renumbered) was revised accordingly.
27	Table 8-6	Page Part II 8-14,	Table 8-6 lists the ARARs which have been determined to be applicable to the limited action option. There are no HWMA/RCRA ARARs listed for this action. The following HWMA/RCRA ARARs are relevant and appropriate for the proposed limited action. IDAPA 16.01.05.008 [40 CFR § 264.14] - Security. IDAPA 16.01.05.008 [40 CFR § 264.15] - General Inspection Requirements. Page Part II 9-1, second paragraph of Section 9 The first sentence should read "A fourth nonradionuclide-contaminated soil/sediment release site, the Mercury Spill Area	Comment incorporated. Comment incorporated.

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			(TSF-08) (see Figure 9-2), was selected to be used for a treatability study in WAG-10 to evaluate phytoremediation." The "plant uptake factors and rates" are implied in the term remediation, and too specific for this discussion.	
28	Section 9.1.1.2	Page Part II 9-4,	Please provide a brief discussion similar to that found in the wags 4 & 5 Proposed Plans concerning the Hazard Quotient (HQ) range that will trigger WAG-10 involvement. Basically, a HQ above 10 will require a remedial action decision by the respective WAG. A site with a HQ of between 1 and 10 may not be remediated initially, but the decision will be revisited during the 5- year reviews in light of the site-wide ecological risk assessment to be conducted in the WAG-10 comprehensive investigation.	Remedial action objectives were not estimated for ecological risk in WAG 1. Screening of sites for ecological risk was carried out, but without an estimation of Hazard Quotients. It was decided that the establishment of HQ's would be left to WAG 10 during the first 5-year review.
29	Section 9.1.3.3, last paragraph	Page Part II 9-6,	This tone of the discussion implies that the public's concerns were basically ignored and the remedy selection was based mostly on cost effectiveness, which is not true from the IDHW/DEQ perspective, and unacceptable. Please qualify this discussion with a brief discussion of the contingent activities planned, expressly to address the concerns stated in the comments.	Comment incorporated. Revised text as directed per E-mail from IDHW.
30	Table 9-3	Page Part II 9-10,	The selected remedy for the Burn Pits is placement of a sloped native soil cover with native vegetation. Sampling and analysis will also be performed to evaluate additional COCs that were not properly evaluated in the RI The following HWMA/RCRA and groundwater protection ARARs for the Burn Pits remedial action are listed in Table 9-3. IDAPA 16.01.11.200 - Idaho Groundwater Quality Rule Primary Drinking Water Standards IDAPA 16.01.05.006 (40 CFR 262.11) - Hazardous Waste Determination IDAPA 16.01.05.006 (40 CFR 262 Subpart B) - The Manifest IDAPA 16.01.05.006 (40 CFR 262.30 - 33) Pre-Transportation	Comment incorporated.

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			Requirements IDAPA 16.01.05.008 (40 CFR 264.13 (a) (1-3) General Waste Analysis IDAPA 16.01.05.008 (40 CFR 264.14) Security of the Site IDAPA 16.01.05.008 (40 CFR 264.15) General Inspections IDAPA 16.01.05.008 (40 CFR 264.16) Personnel Training IDAPA 16.01.05.008 (40 CFR 264 Subpart C) - Preparedness and Prevention IDAPA 16.01.05.008 (40 CFR 264 Subpart D) - Contingency Plan and Emergency Procedures	Comment incorporated.

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			IDAPA 16.01.05.008 (40 CFR 264.92) - Groundwater Protection Standard IDAPA 16.01.05.008 (40 CFR 264.93) - Hazardous Constituents IDAPA 16.01.05.008 (40 CFR 264.94) - Concentration Limits IDAPA 16.01.05.008 (40 CFR 264.95) - Point of Compliance IDAPA 16.01.05.008 (40 CFR 264.97) - Groundwater Monitoring Requirements IDAPA 16.01.05.008 (40 CFR 264.98 (a - f)) - Detection Monitoring Program IDAPA 16.01.05.008 (40 CFR 264.114) – Equipment Decontamination IDAPA 16.01.05.008 (40 CFR 264.171 - 177) - Use and Management of Containers IDAPA 16.01.05.008 (40 CFR 264.310 (a) 1, 2, 3, 4, 5, and (b) 1,4, 5, and 6 -Closure and Post Closure Care	Comment incorporated.
			The HWMA/RCRA ARARs listed in Table 9-3 are acceptable for the selected remedy with the following exception: the format of the citations should be modified to be complete and consistent. IDAPA citings for each of the 40 CFR citations are listed in these comments. Table 9-3 lists IDAPA citations only for the first 40 CFR citation. The IDAPA citations should be listed first followed by the 40 CFR citation in parentheses.	Comment incorporated. A new Table 9-3 was added with these ARARs.
			The text in the first paragraph on page 9-7 indicates that if the additional sample analyses indicate that additional contaminants are present, and a cover cannot be designed cost effectively to be protective based on the presence of additional contaminants, then excavation and disposal may be selected as the remedial alternative. If additional contaminants are detected and excavation and disposal is selected as the remedial alternative, the HWMA/RCRA ARARs will need to be revised. It would be prudent to prepare a contingent HWMA ARARs table in case the additional data supports excavation and disposal for the	

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31	Table 9-5	Page Part II 9-7,	The selected remedy for the fuel leak site is excavation and land farming of contaminated soil at the CFA. The following groundwater and HWMA/RCRA ARARs are specified in Table 9-5 for this action at the fuel leak site. IDAPA 16.01.11.200 – Idaho Groundwater Quality Rule Primary Drinking Water Standards IDAPA 16.01.05.005 (40 CFR 261.4 (b) (10) - RCRA Identification and Listing of Hazardous Waste Exclusions. IDAPA 16.01.05.006 (40 CFR 262.11) - Hazardous Waste Determination The format of the citations should be modified to be complete and consistent. IDAPA citings for each of the 40 CFR citations are listed in these comments. Table 9-5 is not complete for the IDAPA citations. The IDAPA citations should be listed first followed by the 40 CFR citation in parentheses. Under the To-be-Considered Category Idaho RBCA Guidance is listed. The Idaho RBCA guidance is not an ARAR but rather is policy guidance under IDAPA 16.01.02.852 – Petroleum Release Response and Correction Action. Please add the following regulatory citation to the ARARs cited in Table 9-5. The clean-up standards and land farming guidelines are determined through the Petroleum Release Response and Corrective Action Regulations. IDAPA 16.01.02.852 – Petroleum Release Response and Corrective Action (RBCA)	Comment incorporated.
Part III – Responsiveness Summary				
32	first bullet	Page Part III 1-1,	The 1998 planar ISV treatability study (TS) was limited by necessity, and was not necessarily demonstrative in terms of effectiveness, and, especially *compliance with ARARS* based on the needs envisioned now and even then (1998) for proper remediation of the V-tanks. The "success" was provisional and	The first bullet was rewritten to reflect the change in the selected alternative.

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			based on qualified extrapolation to the site at TAN. Also, the treatability study was not subject to review by the public, so implying that the ISV TS was a success in a discussion in the responsiveness summary is a stretch in terms of public scrutiny. The sentence is too sweeping and needs to be deleted or modified.	
33	#2 Response, first paragraph	Page Part III 3-2	It is not clear why, in the sixth sentence, "A combination of treatment and engineering controls, along with institutional controls, is expected to be appropriate for treatment residuals and untreated waste." *Treatment residuals* are not defined, and the nature of the *untreated waste* is not explained. There are just as clearly instances at the INEEL where untreated waste, and not necessarily highly toxic waste, has been or is planned to be removed from the site and disposed elsewhere. Please further clarify the terms in italics in the context of the above statement.	The language comes from 40 CFR 300.430(a)(1)(iii), Expectations, parts A, B, C, and D. The regs do not define either "treatment residuals" or "untreated waste." The sixth sentence was determined to be supplemental material and not strictly necessary to answer this comment, and was removed. The reference to 40 CFR 300.430 remains for readers interested in more information.
34	last sentence of the "Response" at top of page	Page Part III 3-3,	Saying "The remedies proposed for WAG-1 sites are in no way illegal." is unnecessary and should be deleted.	The response specifically addresses a comment alleging that DOE practices "illegal" dumping in INEEL ER activities (see original Comment N3-7 in Appendix A). Therefore, no changes were made to this response.
35	next to last paragraph	Page Part III 3-6,	The last sentence states that "Information on the half-lives of radionuclides has been included in subsequent proposed plans." Please clarify what "subsequent proposed plans" are being referred to.	In response to this request from the public, information on half-lives was incorporated in the WAG 4 and WAG 5 proposed plans and will be included in all future proposed plans written at the INEEL. Clarification has been added to this response to identify the WAG 4 and WAG 5 proposed plans.
36		Page Part III 3-8,	The next to last sentence contains an element that appears to contradict a statement made in the previous sentence. If the cost of the Limited Action (the implication here being Limited Action as the selected remedy) activities is more than the cost of an active response measure, than the Limited Action would not necessarily be cost effective compared to the active response measure. However, the next sentence appears to say that Limited Action is *only* considered when active measures are	This response was taken from 40 CFR 300.430(a)(1)(iii)(D). However, the three sentences were rewritten to clarify the discussion for the public.

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			determined *not* to be practicable or cost effective.	
37	first paragraph of the Risk Assessment Response	Page Part III 3-13,	The second sentence of this response may need clarification based on an earlier statement made in the ROD. On page Part II 6-3, it is stated that a radionuclide concentration analyzed in the 100-year future residential scenario is the concentration that would exist from 100-130 years. Essentially then, the risk assessment does include "anything" (text could use better wording) beyond the 100-year period.	The second sentence was rewritten to clarify the future residential exposure scenario, pursuant to RI/FS §6.3.1.2, Residents (p. 6-17). It is now consistent with Part II, p. 6-3.
38	last sentence of first complete paragraph	Page Part III 3-14	The next to last sentence contains an element that appears to contradict a statement made in the previous sentence. If the cost of the Limited Action (the implication here being Limited Action as the selected remedy) activities is more than the cost of an active response measure, than the Limited Action would not necessarily be cost effective compared to the active response measure. However, the next sentence appears to say that Limited Action is *only* considered when active measures are determined *not* to be practicable or cost effective.	The reference was changed to Section 11. The same change was made in the response to Comment 30 (on p. 3-15)
39	Section 3.2.2.2 Ecological Risk Assessment	Page Part III 3-15,	This discussion is not necessarily accurate based on personal communication with WAG-10 personnel (see specific comment # 26). It is not automatic that a site with an ecological risk "will be evaluated and remediated as appropriate under WAG-10... ". The first responsibility for those decisions falls within the WAG the site is located in, rather than an automatic deferral to WAG-10.	The sentence in question was reworded to clarify that sites with only an ecological risk "may be evaluated under WAG 10 and will be remediated as appropriate."
40	Section 3.2.5.1 Environmental Monitoring	Page Part III 3-18,	Please note that this discussion may have to be revised relative to the V-tanks if the selected remedy is changed in the next draft of the ROD. Also, the same can be said for the discussion pertinent to ISV found on the bottom of page Part III 3-20.	The reference to the V-Tanks was deleted on p. 3-18 (response to Comment 40). Cost information for the V-Tanks was updated and this comment response is now consistent with Part II.
41	first paragraph of Response, second	Page Part III 3-21,	Please add "metals" to the contaminants found in the V-tanks.	The word "metals" was added to the sentence.

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	sentence			
42	response to question #2	Page Part III 3-22,	The second sentence is not correct in stating that "biodegradation or dechlorination would only treat the PCBs..." Biodegradation and/or dechlorination would also treat the volatile organic compounds.	The second sentence was originally worded to prevent any unnecessary confusion among the public that the VOCs other than PCBs were present. However, the sentence was reworded to clarify that biodegradation and dechlorination work on all VOCs.
43	paragraph at top of page (response to Burn Pits question #1)	Page Part III 3-31,	Starting with the third sentence, the sampling and analysis *plans* will not obtain data and "achieve adequate data" for use in selecting the remedy. The plans can only spell out how and what data will be obtained. This sentence is poorly worded and requires revision. The last sentence is not correct. The IDEQ believes the selected remedy is protective only in light of the additional evaluation that will occur, and the results will determine whether or not a contingent remedy will be chosen.	The commenter is correct - *plans* don't obtain data! The word "plans" was deleted in the third sentence. In regard to the last sentence, explanation of the Agencies' position on the selected remedy pending additional evaluation is described in Part II of the ROD. Clarification here would add unnecessary length to the response and is somewhat tangential to the comment. Therefore, the last sentence was deleted.
44	second paragraph	Page Part III 3-35,	Please provide a reference for the first sentence ("Data analysis and modeling...").	The reference has been added. According to §9.1 of the RI/FS, "Infiltration of COCs to groundwater is not expected to produce residential exposure risks greater than the 1E-4 to 1E-6 risk range...." (p. 9-1, last para.).
45	response to question #1	Page Part III 3-35,	It is not clear how the development of the additional alternative, *In Situ Biodegradation using Bioventing*, resulted in the selection of "Alternative 4-Excavation and Land Farming". The connection is not clear and needs to be explained.	The response was rewritten to eliminate any incorrect implication that there is a connection between the development of Alternative 5 and the selection of Alternative 4. A reference to the FS Supplement was added.
	first sentence of response at bottom of page	Page Part III 3-35,	This sentence is not clear nor grammatically correct and needs to be rewritten.	The sentence was corrected.

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			GENERAL COMMENTS	
1	General Comments		The ROD should include the phrase that the releases if not addressed "may present an imminent and substantial endangerment to human health and the environment" in declaration and in the selected remedy section.	Comment incorporated. This was incorporated into the second paragraph first sentence in the declaration and was included into Sections 7.1.1, 7.2.1, 8.1.1, 9.1.1, 9.2.1.
2	General Comments		EPA Region 10 has new guidance on that addressed institutional controls (ICs) at Federal Facilities. The current language appears to address only specific sites at TAN and in a general fashion. For example; The selected alternative for the disposal pond relies heavily on institutional controls. But the description of institutional controls, which is described in most detail on page 8-9, is not sufficiently detailed. For example, the guidance states that OU-specific institutional controls should include the following: "OU-specific IC requirements including the geographic location where ICs apply, the objectives of the control or restriction, and if appropriate, a description of the types of restrictions which need to be in place..." No Further Action sites such as IET stack site, require a site-wide IC's, e.g. check before you dig. This information should be included in a section on ICs. These should also be clearly stated in the ROD.	Comment incorporated. The ROD was modified to include in the Declaration the IC's that will be required for the remedial action sites, and a new Section 12 was included to identify all the "No Further Action" sites and the required IC's. This section will also include the no action sites from the OU 1-07B ROD.
3			The cost table should be revised to include the annual cost of O&M, the number of years of O&M for costing purposes (usually 30) and flag these to note this is for costing purposes only. The actual time frame will vary depending on the rate of cleanup. Also include the discount rate, usually 7% and the level of uncertainty for the costs-usually +50%/-30%. For most actions the capital cost is not broken down into its components while the other ancillary costs are. The details of the capital cost needs to be explained since this cost usually represents the majority of the cost for the action.	Comment noted. On the cost tables a footnote was added that flagged the O&M for 100-years and a discount rate of 5% was used.

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4			Also, The cost of each of the alternatives is never displayed. Accordingly, it is impossible to compare the cost-effectiveness of the alternatives. A cost table should be inserted for each alternatives section. A reference to the RI/FS Report is not helpful since the ROD should be a stand alone document. If supporting information is needed it should be included in the ROD. The statements through out the ROD that reference other documents should be deleted.	Comment incorporated. Costs for the each of the alternatives is now included in text form at the end of each of the alternative descriptions. However, it is felt that a Document can be a standalone document and reference additional material. Per the Guidance for preparing superfund documents the ROD is to be a summary of the RI/FS, Proposed Plan, and Public Comments.
5			Several of the alternatives refer to on-site disposal, e.g., pages 7–16 and 8-4. Yet very few details are provided in the text of the ROD about an on-site disposal facility. More information is contained in the Responsiveness Summary in Part III, (pages 3–17). Even that section indicates that use of an on-site disposal facility for TAN waste is not certain. The text of the ROD should include the same information that is provided in the Responsiveness Summary.	Comment incorporated. Sections 7.1.4, 7.2.4, 8.1.4 have been modified with the following text: "The actual on-site disposal location, which could be the RWMC, the proposed ICDF, or another facility, will be determined during remedial design following implementation of the ROD. Selection of the ICDF for disposal of TAN materials depends at least in part on the timeframe associated with operation of the facility (scheduled for receiving waste April 2003) and its waste acceptance criteria.
6			The discussion of the alternatives needs to be expanded. The text should make it clear why one alternative better meets a criterium and why the other alternatives only partial or fail to meet it. Also there should be a clear statement why the selected alternative is best.	Comment incorporated. Additional text was included in the "Summary of Comparative Analysis of Alternatives" sections for each site that expanded why an alternative best satisfies a criterion, partially satisfies a criterion, or poorly satisfies a criterion.
7			The issue of the time required for the various alternatives to meet RAO's remain a concern. The comparison of alternatives should provide an approximate time for the various remedies to achieve the cleanup goals. At the least there should be a discussion that describes the relative time for the various alternatives to achieve clean up; e.g. Alt X will achieve clean fastest since acid dissolves the contaminants, while Alt Y will achieve clean up slower because it involves presoaking the contaminants. Alt. Z will require the longest time frame since it	Comment incorporated. Additional test was included in the "Summary of Alternatives" Sections for each site that explained when an alternative would accomplish the RAOs.

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			realize on natural processes to achieve clean up.	
8			There should be some summary table in each site-specific section that lists the compounds that were detected and the range of these detections. This is needed to support statements such as "Cs is the only compound of concern." The table could be set up in the following format: Site / Contaminant / Detect PM-2A / Cs / 18/22 Sr / 20/22 Screening Level / # of Samples / Range 23 pCi/gr / 6/22 / 23-187 pCi/gr 10 pCi/gr / 6/22 / 50-200 pCi/Gr If this is not possible, provide some additional text that states what compounds were looked for, what the screening number was, etc.	Comment noted. Sections 7.1.1, 7.2.1, 8.1.1, 8.2.1, 9.1.1, and 9.2.1 titled Summary of Site Risks, the RI/FS was referenced for additional detailed information such as this comment has asked for. This information is presented in the RI/FS which is referenced and is available in the Administrative Record for more detailed information such as this.
9			The following information should be in the summary of site risks or in the scope and role section. This information should state the COCs at each site, how they were determined and what the exposure point concentrations were. Note the exposure scenarios, routes and why the routes are appropriate (i.e. the conceptual site model) for each site. Also, include the baseline risk by media and chemical and uncertainties.	Comment incorporated. Table 6-1 was revised to include each remedial action site's COCs, range of detected concentrations, FRGs, exposure pathways, and risks and hazard index posed at the site.
10			There should be some discussion about the difference between No Action sites, sites that have no risk based on investigation and No Further Action sites; sites that pose no risk as long as conditions do not change. Long term institutional controls are necessary for the latter.	Comment incorporated. This discussion has been included in the new Section 12 for institutional controls.

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11			The discussion of the mercury spill site is confusing to several reviewers. Providing some background on this site may be useful. For example - The site is a concern due to an elevated HI should residential use occur at the site. This HI is a result of mercury contaminated soil being brought to the surface for gardening and ingestion of these crops. There is uncertainty regarding an INEEL specific uptake of mercury by plants. Accordingly WAG 10 will perform additional studies at this site to determine this uptake and a revised risk analysis will conducted from the site-specific data.	Comment incorporated. The entire background was not used in early sections of the document because of the concise nature of these sections. Background information was added to the last paragraph of Part II, page 4-1 about TSF-08 and the purpose of the treatability studies, as suggested. Text Page iii has been revised to reflect that the treatability study will be used to determine specific uptake of mercury by plants. The following text in Section 9.0, second paragraph (after first sentence): "This site is a concern due to an elevated HI should residential use occur at the site. This HI is a result of mercury contaminated soils being brought to the surface for gardening and ingestion of these crops. There is uncertainty regarding an INEEL specific uptake of mercury by plants. Accordingly WAG 10 will perform additional studies at this site to determine this uptake and a revised risk analysis will be conducted from the site-specific data."
12			The tables that list ARARs contain many citations that are not usually found in RODs. These should be reviewed to insure that it is appropriate to include them as ARARs. Additional comments regarding this issue can be found later in this document.	Comment noted.
13			Please provide language in ROD that will state that if remedy is not implemented within 5 years from signing of the ROD, that agencies may reevaluate selected remedy.	Comment incorporated in Section 7.1.4, last paragraph.
			SPECIFIC COMMENTS	
1		iii	It should be clearly stated in the declaration and also in the scope section that this is a final ROD for the sites that were investigated. If other sites are discovered, and given the fact that this is a heavily industrial site with ongoing operations such events are likely, they will addressed under a separate decision document.	Comment incorporated. The first sentence of the second paragraph in the Statement of Basis was revised to indicate that this is the final ROD for the investigated sites. Similar language was added to the scope section. Text about new sites was clarified and made consistent throughout the document.

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2	2nd parg	iii	The need for site ICs should be noted in this section.	Comment incorporated. The second paragraph was modified to include the need for institutional controls.
3	PM-2A tanks	v	If RCRA clean closure is necessary it should be stated in this section.	Comment incorporated. In the Description of Selected Remedy Section for the V-Tanks and the PM-2A Tanks, a sentence was added that this ROD does not address the RCRA closure activities which will be addressed separately if needed.
4	TSF-06	v	Note that if contamination above cleanup standards is found below 10' then long term institutional controls will be required.	Comment incorporated. This was incorporated into the last sentence in the description of the TSF-06 remedy and also in the last sentence of the WRRTF-13 remedy.
5	Disposal Pond	vi	Include the objective of ICs.	Comment incorporated. This was incorporated by revising the second sentence of the final paragraph of the TSF-07 remedy
6.	Fuel Leak	vii	EPA recommends the following edits. Bullet 1 should read ". . . Leak soil and to determine . . ." The 2nd bullet should read "concentrations are above risk based remediation goals in accordance with . . .Petroleum Releases, which ever are less. Again note that if contamination above risk base levels is left on site ICs will be necessary	Comment incorporated. The first and second bullets were changed as suggested.
7	Potential New Sites.	vii	See the second paragraph on Page 10-1. This information should be brought forward into the Declaration. Perhaps some text is missing on P vii. This text states that the new sites will be evaluated in the 5-year review document. Of course this is not the case. Sites will not have to wait till a 5-year review occurs to be evaluated.	Comment incorporated. The ROD has been revised to be consistent with Section 10 and was modified to reflect that agencies will determine appropriate action per the FFA/CO and this ROD. Legacy waste was changed to IDW and is discussed in the new Section 12.
8		1-1	Somewhere in the introduction there should be a discussion addressing NEPA issues. If any of these sites in wetlands, flood plains, historical places, etc. it should be stated here.	Comment incorporated by adding new paragraph before the start of Section 1.1 that states that NEPA issues will be addressed in post-ROD documents.
9	Section 1.1 last para.	1-3	The discussion of IC for GW and the use of "deed restrictions" needs to be focused on the goals of the ICs. Also, does DOE have an actual "deed" they can put restrictions on?	Comment noted. Deed restrictions was changed to property transfer documentation.

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10	Section 2.2	2-1	The fact that there is a final ROD for of TAN groundwater should be noted.	Comment incorporated. This was incorporated into the fourth paragraph second sentence in section 2.2.
11	Section 2.3	2.2	The ROD should be a "stand alone" document. EPA recommends deleting this section.	Comment incorporated. Per 8/4/99 teleconference discussion, the second sentence of the first paragraph of Section 2.3 was revised to "...are primarily based on..."
12	last para	3-2	Please include language indicating that the Responsiveness Summary includes responses to questions received during both public comment periods of the WAG.	Comment incorporated. This was incorporated into the twelfth paragraph first sentence in section 3.
13	1st para	4-1	Some place holder language regarding the issue of the tanks and RCRA need to be included. The language should discuss the issue of RCRA closure and the tanks. While closure may not be required the tanks are being cleaned closed to address possible RCRA issues (or because it makes good environmental sense.)	Comment incorporated. A new second paragraph was added to the Section with language as requested.
14	5th para	4-1	Please explain why the 53 sites did not pose a threat the environment. In the discussion include the land use considerations and/or other criteria.	Comment incorporated. Per our conference call on 8/10/99 it was agreed to include into the text at the end of the first sentence the following: "... health and the environment based on a residential scenario."
15	last para	4-1	This paragraph discusses TSF-08. As noted earlier it is not clear what the status of this site is. Additional explanation is needed and should be checked for consistency with the rest of the text in the ROD.	Comment incorporated. This paragraph and similar paragraphs from Section 2.2 and 11 were revised to more clearly explain the site status and further action and to be consistent throughout the document.
16	Table 4-1	4-2	Add a column that states why the site is recommended for No Action; whether no contamination found, land use restrictions, action delayed till associated D&D activities are completed, etc.	Comment noted. A new third sentence to the fifth paragraph of Section 4 was added that references rationale for determining "No Action" site status in Section 12.
17	Footnote a	4-3	Since TSF-27 was a no action site is the site still under RCRA or is it considered closed out?	The CERCLA "No Action" determination for TSF-27 closes out the LDU site, based on agreement between IDHW and DOE-ID.
18	Section 6.1.4	6-3	First paragraph is correct but the distinction between No Action and No Further action sites should be made. NFA Site most likely will require some sort of institutional controls.	Comment incorporated. A new second paragraph was added to Section 6.1.4 that distinguishes No Further Action sites as requiring institutional controls.

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19	Section 6.2.3	6-5	Please explain how ICs will minimize exposure to ecological receptors.	ICs will not minimize exposure to ecological receptors, the last sentence of Section 6.2.3 was revised to reflect this.
20	Section 6.3 2nd para	6-5	State that 1-07B is a final ROD and the date that it was signed. Revise the last sentence to read; ". . only risks from the contaminants that could leach from the near surf soil was evaluated.	Comment incorporated. This was incorporated into the second paragraph, new second sentence of Section 6.3. The last sentence of the paragraph was revised as suggested.
21	1st para	6-6	It is true that modeling predicts that contaminant migration will not result in exceedances of risk based numbers. However, has the potential for MCL exceedances been determined? If so include such a statement here.	Comment incorporated. The comment was incorporated at the end of the third paragraph in Section 6.3 to indicate that MCLs are not expected to be exceeded, based on modeling results.
22	3rd para	6-6	This paragraph is confusing. Is the following the gist of the paragraph? There is currently no contamination in the perched aquifer. Even after the disposal pond no longer receives water there will no contamination in the perched aquifer. Any contamination that may have entered the perched aquifer will not impact groundwater.	Comment incorporated. The last paragraph of Section 6.3 was revised to clarify.
23	Section 6.4	6-6	Are any wastes on site "principle threat waste"(guidance attached)? If so, a statement to that effect should be included. (This comment applies to all sites.) For example, the statement can be phrases to read "the principal threat at TAN 1-10 is the waste in the V-tanks. The treatment selected will address organic compounds in the waste. However, the radionuclides found in the waste can not be destroyed. They will be immobilized in the vitreous matrix." Note that not all sites have a "principal threat waste." Waste that is not mobile and/or is of low to moderate toxicity is not considered a principal threat waste.	Comment incorporated. This was incorporated in the "Selected Remedy" Section for each site and states whether a waste is a principal threat waste or a low-level threat waste. The comment was also incorporated into the Declaration.
24	Table 6-1	6-7	This table should provide more information. See General Comment 8 for an example of the information needed.	Comment incorporated. Table 6-1 was revised to include each remedial action site's COCs, range of detected concentrations, FRGs, exposure pathways, and risks and hazard index posed at the site.

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25	Section 6.4.1- last para	6-7	This provides good information. However, it should also discuss the basis for the FRGs (which are cleanup levels?).	Comment incorporated. Per our 8/10/99 conference call the last paragraph in section 6.4.1 first sentence was revised to "To meet these Remedial Action Objectives, final ...."
26	Last sentence	6-9	This and similar references to other documents should be deleted from the ROD.	Comment incorporated. The last sentence in Section 6.4.2.2 was deleted per teleconference discussion 8/4/99.
27	Section 7.1	7-1	Some additional text should be provided, perhaps following the last paragraph of Section 7.1. This text should discuss how this action will meet the regulatory needs of TSCA and/or RCRA. Include a statement that, at the time of ROD signature, the following RCRA and TSCA ARARs are determined to be relevant and appropriate and why. Or better yet, state that this ROD will not address RCRA closure issues which will be dealt with as a separate action with the State RCRA folk. Also, it may be useful to expand the discussion in the second and third paragraph to clearly state that the CERCLA site does not include all ancillary piping. If the RCRA "tank system" is to be addressed under a CERCLA action it will not be through this particular ROD.	Comment incorporated. A sentence was added in Section 7.1.4, second paragraph, which states "Implementation of this remedy will satisfy the substantive and administrative RCRA and TSCA closure requirements." In addition, a sentence was added in the Description of Selected Remedy Section for the V-Tanks and PM-2A Tanks that this ROD does not address the RCRA closure activities, which will be addressed separately if needed.
28	Section 7.1.1	7-1	This section should include information the concentration data, what was detected, what is a COC and why (or why not ever detect) and exposure point concentration. This can be presented in tables. This comment applies to all sites discussed in this ROD.	Comment noted. Table 6-1 was revised to include additional information, as requested. The site specific tables were not revised to stay consistent with data from the Proposed Plan.
29	Somewhere (a separate section?)	7-3	The key ARARs associated with this site should be noted (this comment applies to all site-specific discussion).	Comment incorporated. These key ARARs have been incorporated into the Summary of Alternatives Sections.
30	Section 7.1.1.1	7-3	State what the exposure route is that contain the COCs. Is it soil, tanks contents or what?	Comment incorporated. Section was revised to state that radiation exposure would be from surface and subsurface soil.

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SKIPPED SECTION 7.1.2 TO SECTION 7.2.				
31	Section 7.2.1 Table 7-4	7-12	This table should provide more information. See General Comment 9. This comment applies to all such tables.	Comment noted. Table 6-1 was revised to include additional information, as requested. The site specific tables were not revised to stay consistent with data from the Proposed Plan.
32	Section 7.2.2	7-13	Please provide an explanation as to why 23.3 pCi/gr is an acceptable remediation goal. This should discuss why the remediation is departing from 10-6 and why it exceeds 1X10-4. It may be useful to place this discussion in an earlier part of the ROD if such RAO is used elsewhere in the ROD. Also, discuss the RCRA status of these tanks if appropriate. Provide an explanation as to how the tanks will be decontaminated.	Comment incorporated. Per our 8/10/99 conference call text was included in section 6.4.1 last paragraph which explains that the FRGs are set up to allow or unrestricted residential use. This comment was incorporated in the "Summary of Alternatives" sections that discuss the remediation goal of 23.3 pCi/g. A paragraph was added to the end of section 7.2.4 that states this ROD does not address the RCRA and TSCA closure requirements of TSF-26.
33	Section 7.2.2.1	7-13	Why does the material excavated from the tanks require stabilization (needed to reduce mobility, to meet LDR)? Note that the next alternative does not discuss the need to stabilize. Why do the discussions differ? Also, provide a discussion of costs and time for implementation. The discussion of where on site and where off site disposal will occur needs to be expanded. This can be site-specific or as a global discussion in some introductory section.	Comment noted. Per the RI/FS, there is no need for stabilization for Alternative 3. There is additional text included that explains the cost and time for implementation for all alternatives
34	Section 7.2.3.2, 2nd para	7-15	Delete the section beginning, "However, the comparison of alternatives on this criterion . . ." "Cost effectiveness" is an issue in the statutory evaluation. Even there, one is not obligated to select the most "cost effective" alternative but an alternative that is reasonably cost effective. This comment applies to similar discussions throughout the ROD.	Comment incorporated. The discussion of cost-effectiveness has been removed and the "Balancing Criteria" Sections only discuss cost. The issue of cost-effectiveness is discussed in the new Statutory Determination Section, Section 13.
35	Section - 7.2.3.3 last para	7-15	If the concerns regarding compliance with ARARs is truly an issue the problem needs to be addressed and quickly resolved.	Comment noted. Per the 8/4/99 teleconference, when this issue was discussed, it was agreed by the Agencies that there are no ARAR problems at this site.

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36	Section 7.2.4	7-15	Please provide a more detailed and site-specific explanation of why this is the best remedy. EPA recommends using the bullets found in the Declaration and expanding the discussion from there. Cleanup goals should be stated, such as removal all rad. contaminated soil to X pCi/gr, etc.	Comment incorporated. The Selected Remedy sections have been revised as suggested to include additional information.
37	Section 7.2.4	7-16	The discussion in the 5th paragraph indicates that the tank contents will pick up another waste code for metals. If true, state this in this section. In the next paragraph it should clearly state that the disposal site for this material is X, or Y or a similar site that will meet disposal requirements. Thus the reader is assured that disposal will not occur just anywhere on the INEEL. Also note in this section whether ICs will be required and why.	Comment incorporated. A sentence was added that the treatment would satisfy all applicable waste codes, based on results of further characterization. The disposal site was clarified to be an INEEL site that meets disposal requirements. A new paragraph was added to the end of the section that states the need for institutional controls.
38		7-16	A new subsection titled Statutory Determination and labeled 7.2.5 should precede Section 7.2.4.2. This if following the format of ROD in Region 10 and at least some INEEL ROD's, see WAG 3-13. Also, this section should contain the regulatory language found in the first 2 bullets of the attached Page 4, Guidance on Developing Superfund Records of Decision (May, 1990).	Comment incorporated. A new Section 13, Statutory Determination, was added.
39	Section 7.2.4.2	7-16	Include a brief discussion of any residual risk at this site following completion of the remedial action. If no residual risk will be present state that. Also, the discussion of "residual concentrated waste" is vague but unsettling. Please expand this term or delete it.	Comment incorporated. A sentence was added about the residual risk at the site. The discussion of residual concentrated waste was clarified.
40	Table 7-6	7-19	RCRA treatment standards, if applicable, should be stated. This will "freeze" the values to current standards. Otherwise the standards can change with time. This, of course, applies only to on site disposal.	Comment noted. Based on our conference call 8/10/99 it was agreed that any waste that is generated and treated or disposed of from the AOC will comply with the latest regulations.
41		7-20 & - 21	EPA recommends deleting the RCRA standards unless this is a TSD, which hasn't been stated. Also, the citation for Subpart X unit does not appear to be necessary or useful.	Comment noted. IDHW has agreed to ARARs list.

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42	Section 8.1 2nd para	8-1	Explain why contamination is suspected beneath the road, (due to leaching, use of road, road as capping material). Provide more background details, date of release, depth of contamination etc.	Comment noted. As part of the selected remedy for TSF-06, the road will be removed and sampled. If sampling indicates the need to remove the road bed, it will be done as part of the removal. The road bed and asphalt will be replaced.
43	Section 8.1.2.2 & Section 8.1.2.3	8-3	In Alt. 2 implementability is low because of the presence of the road. In Alt. 3 implementability is high. It is not clear why this is so. The road is an issue with both alternatives.	Comment noted. These were verified with the OU 1-10 RI/FS and there is no explanation to the ranking.
44	Section 8.1.4	8-4	This is a better discussion of the selected remedy. However, this section specifically states that the soil will be disposed of in a proposed facility. EPA recommends that this be more general; perhaps delete the first sentence and just expand the discussion about appropriate facilities based on the following factors. Then discuss the factors.	Comment incorporated. The second paragraph of Section 8.1.4 was revised as requested.
45	Section 8.2.1.2	8-9	Revise the discussion on HI. Note that if several individual contaminants affect the same organ the impacts are added. If the case is that the other calculated HI are minute, then that should be clearly stated.	Comment incorporated. The fourth sentence in the second paragraph of Section 8.2.1.2 was revised to explain that the other contaminants for which HIs were calculated were significantly less than the HI for mercury.
46	Section 8.2.1.3	8-9	State what drives the HI for eco. to be greater than one. Does the action under taken at this site decrease the eco. risk HI.?	Comment incorporated. The first sentence of Section 8.2.1.3 was revised to include the contaminants that have a HQ greater than 1 for ecological receptors.
47	Section 8.2.4	8-12	Expand the discussion on the selected remedy. See the bullets in the declaration for an example to start. The statement that limited action was selected because it meets ARARs implies that the other alternatives don't. How is it that Alt. 3 does not meet ARARs. Also, the discussion should include more information on what the ICs are and how these ICs are to be implemented For example, the guidance states that OU-specific institutional controls should include the following: "OU-specific IC requirements including the geographic location where ICs apply, the objectives of the control or	Comment incorporated. The discussion of the selected remedy was expanded. A new Section 12 was added that explains institutional controls for all sites. Section 12 was written to conform to EPA Region 10 guidance on institutional controls at federal facilities.

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			restriction, and if appropriate, a description of the types of restrictions which need to be in place..." a A more complete list of restricted activities for the disposal pond should be included in the ROD. b The ROD should also include an explanation of how institutional controls for the disposal pond will be integrated with facility-wide comprehensive institutional controls. c The tracking mechanism for institutional controls should be identified. For example, in previous INEEL RODs, the Department of Energy has included the following language: "A description of the areas where access will be restricted, the specific controls (e.g., fences, signs) that will be used to ensure that access will be restricted, the types of activities that will be prohibited in certain areas (e.g., excavation), and the anticipated duration of such controls will be placed in the "INEEL Comprehensive Facility and Land Use Plan" maintained by the Office of Program Execution. DOE shall also provide the Bureau of Land Management the detailed description of the controls identified above. This information will be submitted to the EPA and IDHW once it has been placed in the INEEL Comprehensive Facility and Land Use Plan." Region 10's guidance also includes the following requirement: "Within **six months** of signature of a decision document, the facility will submit to EPA and the state a monitoring report on the status of their ICs. The facility will then submit an updated IC monitoring report to EPA and the state at least annually thereafter. If a facility wishes to submit one IC monitoring report to cover all OUs and all ICs at the entire facility, the	

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			deadline for the initial or subsequent IC monitoring reports may be modified to allow integration of the different decision document signature dates, subject to approval by EPA and the state."	
48	Table 8-6	8-14	Please state how and to what the ARARs and TBCs apply.	Comment incorporated. The table was revised to state how and to what the ARARs and TBCs apply.
49	Section 9 1st para	9-1	This introduction indicates that nature and extent of contamination will be presented. However, it appears that this information was not included in the following discussion. Please correct and revise	Comment noted. The nature and extent of contamination is presented in Section 9.1. If there is additional language needed, please suggest the proposed revision.
50	Table 9-1	9-4	As noted in earlier comments, the areas for the WRRTF burn pits in this table do not agree with the areas noted in the RI/FS for these sites.	Table 9-1 has been removed to avoid confusion.
51	Section 9.1.2.2	9-5	EPA recommends the following edit of the second sentence in the second parg. ". . . however, the cap would prevent contact to lead contamination and mobility would reduced." See the NCP, 300.430(a)(iii)(B) that allows for engineering controls, such as containment for wastes that are not principal threats. Next sentence; since there is currently some clean soil capping the sites, it does not appear likely that workers would be exposed by placing additional on the soil in place. Please revise accordingly.	Comment incorporated. The second sentence was revised as suggested. The third sentence was not revised because the short-term effectiveness is reduced by the possibility for worker exposure, and this will have to be evaluated in the RD/RA.
52	Section 9.1.2.3, 3rd para	9-5	It needs to be made clear that alt 3a does not involve treatment of the soil and alt 3b does. Otherwise both 3a and 3b should equally meet the criteria for reduction of TMV through treatment.	Comment noted. The difference between 3a and 3b is INEEL disposal or off-Site disposal, neither assume treatment.
53	Section 9.1.3.2	9-6	As noted earlier, this could be the section where the main ARARs are noted.	Comment incorporated. The primary ARARs evaluated for each site will be presented in the Summary of Alternatives Section.
54	Section 9.1.4	9-7	EPA recommends the following revision of the 2nd parg.; "The native soil cover is intended to provide a stand off cover of clean INEEL native soils . . " Note that the soil cap does not	Comment incorporated. The second paragraph was revised as suggested. The references to 10' thick soil cap and 4:1 slopes were removed and stated that it would be designed in the RD/RA

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			need to be 10' thick. If this was done for costing purposes it should be noted as such. The rest of this section needs to be revised to reflect that the need is for a stand off cover, not to allow the sites to be developed as residences. In this light the 2nd parg. also needs to be revised. It may not be appropriate to have 4:1 slopes, For example such slopes were not designed for the CFA landfill cap. Also, the selected remedy relies on ICs. The comments made previously regarding ICs are applicable here. There are additional ICs comments from the review Section 10. Please provide details on "legal land-use restrictions".	phase. The discussion of ICs was modified and the new Section 12 was referenced. The details of legal land-use restrictions is part of the Institutional Control Plan, a post-ROD document. The sentence about legal land-use restrictions was deleted and Section 12 was referenced.
55	Section 9.1.4, 4th para	9-7	EPA suspected these are typo errors and recommends the following changes, ". . be conducted on a periodic basis as part of this alternative." Also, delete the last sentence in this paragraph. Note that the discussion on IC should be included here if not in a stand alone section.	Comment incorporated. The fifth paragraph of Section 9.1.4 was revised as suggested. Institutional controls will be addressed in Section 12.
56	Section 9., 5th para.	9-7	Delete the last part of second sentence beginning "..in samples taken . ." Note that the areas and depths noted for the WRRTF pits do not agree with Table 9-1. Also, Fig 9-1 should be replaced with two smaller figures but allow one to identify the individual burn pits. Also, through a figure or description, the area at the WRTTF burn pits that will be capped should be made clear. For example a statement that" an area A by B will be covered with native soil to a minimum depth of 2 feet. This soil will prevent direct exposure to the contaminants and will be compacted so that it is less permeable than the underlying material to prevent infiltration from creating a bathtub effect." should be included.	Last part of second sentence of fifth paragraph of Section 9.1.4 was deleted as requested. Table 9-1 has been removed to avoid confusion. Figure 9-1 now includes an expanded view of WRRTF-01 that identifies the individual pits. The final comment was incorporated by including the sentence as suggested, but without stating the size of the area, because this is stated generally already (400 x 164 feet).
57	Section 9.2.1.1.	9-9	EPA recommends that the M-designations for the receptors be deleted.	Comment incorporated. M-designations were deleted from receptors in the first paragraph second sentence.
58	Table 9-3	9-10	EPA questions the listing of IDAPA 16.01.11.200 as an ARAR. Also, it is not clear why the numerous RCRA ARARs are cited.	The state agrees that IDAPA 16.01.11.200 is an applicable ARAR; leachate from the burn pits can not adversely impact

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			It may be useful to list a few of these regulations but they should probably be R/A. One of the ARARs for the burn pits identified in Table 9-3 are groundwater monitoring requirements under 40 CFR § 264.97. This regulation requires installation of monitoring wells. But installation of the wells is not mentioned in either the text of the selected alternative or the cost estimate. How does INEEL intend to comply with these requirements? Also in Table 9-3, landfill closure and post-closure requirements are identified as "applicable." Because the burn pit is not a landfill, these requirements should be identified as "relevant and appropriate."	groundwater. The State agrees with the RCRA ARARs. Comment incorporated. This ARAR was changed to "relevant and appropriate" as recommended.
59	Section 9.2.2.2 & Section 9.2.2.3	9-13	It is not clear to EPA why excavation of the site is ranked moderate due to the presence of existing structures while capping is ranked as less implementable. Also, the discussion of Alt. 4 does not mention a phased approach associated with this remedy. However, on the top of P. 9-15 the potential for a phased approach is mentioned.	Comment noted. This is per the RI/FS
60	Section 9.2	9-9	It is not clear if this site represents a leaking UST or can be construed as an RCRA release site. If the latter, has this possibility been investigated?	This site was identified in the FFA/CO as a CERCLA site; it is not a RCRA release site.
61	Table 9-4	Alt. 4	Will remove the contamination. Thus, there is not a need for 5-year reviews.	Comment incorporated. The table has been revised to indicate that the 5-year reviews are not applicable.
62		10-1	This section needs to be expanded. The distinction between sites that pose no risk because there is no contamination present and those sites that require no further action as long as certain restrictions, such as land use, remain in place. The latter will require 5-year reviews to insure that the assumptions have not changed. EPA recommends including language similar to excerpts from the OU 3-13 draft final ROD. This language can be found attached to the comments.	Comment noted. This discussion of no action vs no further action can be found in new Section 12.

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63	2nd para	10-1	The ROD appears to have three different approaches to the issue of "coexisting facilities." See pages vii and Part III, 3-7. EPA recommends that the discussion of the approach be consistent and favors the discussion in this section.	Comment incorporated. The ROD has been made consistent throughout.
64	Mercury Site.	11-1	This discussion of this site is difficult of understand and should be revised and clarified.	Comment incorporated. See comment resolution for EPA Specific Comment #15.
65	last para	11-3	The option for off site disposal is not discussed in the section on the selected remedy and should be. Also, any changes in cost due to this should be noted.	Comment incorporated. A sentence was added to the end of the last paragraph of Section 7.2.4 that discusses the off-site disposal possibility. Table 7-5 was revised with a footnote that indicates the cost does not include off-site disposal.
PART III				
66	2nd bullet	1-1	This issue of compliance with ARARs and verifiability is not discussed in the body of the ROD for this site. It should be if this is a legitimate concern.	The response to these public comments (see Comment 58) describes how ARARs and verifiability will be insured.
67	Comment 2	3-2	The reasoning expressed in this response also be included in Part II. (see comments regarding principal threat). Also, another point of the comment is how does one chose on-site versus off-site disposal. That portion of the comment is not addressed in the response but should be.	Part II now identifies principal threats for each site. Regarding the distinction between on-site vs. off-site disposal, since this public comment asks only about the reasons behind alternatives that leave containment in place vs. removal of any type, the distinction between on-site and off-site is not germane here. (Note, however, that comments specifically addressing selection of on-site vs. off-site disposal are contained in Section 2.2.6, Evaluation of Alternatives.)
68	Comment 5	3-3	The response to this comment, that legacy waste was not generated during this investigation, does not agree with the statement on Page vii, Potential New Sites that discusses how legacy waste will be handled.	The language on p. vii has been revised to correspond with the response to Comment 5.

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69	Comment 6	3-3	This comment deals with residual risk. This information should be incorporated into Part II of this ROD as well. Also, EPA recommends that the 3rd sentence in the response read "The RAOs are risk based goals."	The new institutional controls (ICs) discussion in Part II, Section 12, identifies what ICs will be required and how they will deal with residual risk. The third sentence of the response was rewritten to be consistent with the definition for RAOs approved by the Agencies in the WAG 4 Proposed Plan.
70	Comment 1	3-7	Again, review to insure that this response it consistent with text elsewhere in the ROD, such as p. vii and 10-1.	The response was revised to be consistent with language in Parts I and II.
71	Comment 1 1st para	3-10	If there is a time frame for this evaluation, such is planned to occur within 5-years please include. As it stands the response is quite open-ended. Any time constraints would be make the response more informative.	In the August 4, 1999, conference call among Matt Wilkening; Clyde Cody, IDEQ; Dave Michael, LMITCO; and Craig Reese, Parsons; a time frame of 5-years was agreed on. The response has been revised accordingly.
72	4th & 5th bullet	3-12	This information should be included in the Scope and Role section of the ROD. Also, check to insure that other sites are not missing.	Language has been added in Part II to clarify what sites are covered under this ROD, and in Part III to clarify that the TAN Pool is not being addressed under this CERCLA action.
73	last para	3-13	Typo please correct	The sentence was corrected.
74	Comment 3 & 4	3-16	Please review and update given current concerns with the V-tanks.	The responses to these comments have been updated.
75	Comment 4	3-17	This information should be included in the decision summary regarding this alternative as well as in the acceptance criteria.	This information has been incorporated into discussions of the PM-2A Tanks and Soil Contamination Area in Part II.
76	Section 3.2.5.2 Comment 1	3-18	Given the new guidance on ICs, the response to this comment should be updated.	A reference has been added to the response to this comment, referring to the new information in Part II, Section 12, that identifies all institutional controls for each site.
77	Comment 5	3-20	This response (and probably others) needs to updated given the issue with ISV.	The response has been updated.
78	Comment 1 3rd para	3-21	CERCLA 104(a)1 allows response based on "substantial threat of release" as well as past releases. The argument to make is that releases from the tanks would result in imminent and substantial threat to the environment (critical vs chronic risk) which turn drives action for the tanks.	The language has been amended to clarify the reasons for action.

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79	Comment 1	3-22	ARARs waivers can be obtained provide one has good cause. The action must still be protective and the State's concurrence is desirable. The current response can be interpreted as one not wanting to put forth any effort to request a waiver, which is not true	Comment noted.
80	1st para	3-23	Please insure that the discussion of the alternatives clarifies that the sludge would be removed with high-powered jets.	The response to both Comments 50 and 57 was modified to agree with the description in Part II of the ROD and the FS Supplement.
81	3rd para	3-36	This issue of criticality should be addressed in PM-2A site description in Part II of the ROD as well as here. Also, the 1st line of the next paragraph should be revised. See Comment 78.	The Uranium-235 in the tank contents was further evaluated after the publication of the February 1998 proposed plan. Although uncertainties exist in the estimated concentration of fissile materials in the TSF-26 tanks, the tanks contain no free liquids and therefore do not present a credible criticality safety concern. Further evaluations will be performed during the remedial design phase to verify that the selected remedy will not result in a criticality concern if the selected remedy would require addition of any liquids into the tanks prior to removal of the contents.
82	Comment 1	3-28	The response to this comment explaining why the approach to TSF-07 is sound should be included in the decision summary in Part II.	Comment noted.
83	1st response	3-29	The response does not appear to address the last 2 or 3 issues that the commentor raised.	Comment noted. Comment # 63 was revised to include discussion of listed RCRA waste and includes discussion of a no-longer-contained-in determination for this site.
84	Comment 4	3-32	Note that an ESD will be required if excavation of the burn pits occurs. The response should indicate this. Also note in the response that the ESD will provide notice to the public of the change in approach to this site.	Language was added to the response to describe (a) the possible need for an ESD and (b) how the public would be notified. The additional sentences conform to OSWER Guidance on need for and preparation of ESDs.
85	1st para response	3-33	Please clarify what land use assumptions were used to determine the threshold levels. If ICs are required for a time period please state this in the response.	The response was rewritten to clarify.

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86		3-33 & 34	Please review the response to comments to insure they are consistent with the proposed action. Is the study to develop a site-specific uptake rate for Hg at INEEL or to test the ability of plants to remediate the site?	Comment noted. Parts I and II were reviewed and made consistent with Part III.
87	1st para	3-35	Diesel and other petroleum products may not have values found in IRIS etc. However, the RBCA standards are based on something. Toxicity?	Comment noted. Prior to January 1997, TPH was used for cleanup goals which does not have values in IRIS. RBCA superseded the old TPH so that risks could be calculated for constituents of gas and diesel. RBCA is based on toxicity.
88		3-35 & 36	Please check to insure the response to comments is consistent with the description of the remedy in Part II.	Comment noted. The document was checked between Parts I, II, and III for consistency.